



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
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New York, New York 10007*

November 24, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

Pursuant to the Court's Order at Dkt. No. 495, the Government submits proposed redactions to the filings associated with the Government's motion to preclude six defense experts. In addition to the proposed redactions, the Government respectfully seeks to redact Government Exhibit A, the defense expert notice, which the Government has filed on the docket with the same redactions (*see* Dkt. No. 424-1), and moves to file Government Exhibit B under seal. The Government's proposed redactions and sealing are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the parties' briefing and the Court's Opinion & Order are judicial documents subject to the common law presumption of access, the limited proposed redactions are narrowly tailored to protect the privacy interests of the Minor Victims, including a Minor Victim who is a subject of the Court's pseudonym order.

The defense has informed the Government that it is not seeking any additional redactions.

